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SOUTHERN DISTRICT OF CALIFORNIA
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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

July 2007 Grand Jury

UNITED STATES OF AMERICA, Plaintiff, v. RACHELLE LYNETTE CARLOCK (1), ELLA LOUISE SANDERS (2), ERIC REGINALD ROBINSON (3), Defendants.	Criminal Case No. 08CR1895-MMM I N D I C T M E N T (Superseding) Title 18, U.S.C., Sec. 2332a - Conspiracy to Use a Weapon of Mass Destruction; Title 18, U.S.C., Sec. 2332a - Use of a Weapon of Mass Destruction; Title 18, U.S.C., Sec. 371 - Conspiracy to Maliciously Damage Buildings or Real Property, by Means of an Explosive, and Manufacture and Possess Firearms; Title 18, U.S.C., Sec. 844 - Malicious Damage to Buildings or Real Property, by Means of an Explosive; Title 18, U.S.C., Sec. 924(c) - Possession of Destructive Device in Relation to a Crime of Violence; Title 18, U.S.C., Sec. 844(h) - Use of Explosive to Commit a Felony; Title 18, U.S.C., Sec. 2 - Aiding and Abetting; Title 18, U.S.C., Sec. 842(a)(2) - Use of False Identification to Obtain Explosive Materials; Title 18, U.S.C., Sec. 842(i)(1) - Felon in Possession of Explosive Materials; Title 18, U.S.C., Sec. 1028(a)(7) - Fraud in Connection with Identification Documents

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The grand jury charges:

Count 1

1. Beginning on a date unknown to the grand jury, and continuing through May 4, 2008, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON, within the Southern District of California and elsewhere, did knowingly and intentionally conspire to use a weapon of mass destruction, without lawful authority, to wit: pipe bombs, against property used in interstate commerce and in any activity affecting interstate commerce, and property owned, leased and used by the United States and one of its departments; in violation of Title 18, United States Code, Sections 2332a(a)(2)(B) and (3).

2. In furtherance of the conspiracy and to effect its objects, the following overt acts, among others, were committed within the Southern District of California and elsewhere:

a. On or about March 26, 2008, in El Cajon, California, defendant ELLA LOUISE SANDERS purchased one pound of explosive materials, namely, Hodgdon's Triple Se7en Powder (a smokeless powder).

b. On or about April 7, 2008, in El Cajon, California, defendant RACHELLE LYNETTE CARLOCK purchased two pounds of explosive materials, namely, Hodgdon's Triple Se7en Powder (a smokeless powder).

c. In or about April 2008, defendant ELLA LOUISE SANDERS stole pipes and end caps from a Home Depot for use in the construction of pipe bombs.

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d. In or about April 2008, defendant ERIC REGINALD ROBINSON drove defendant ELLA LOUISE SANDERS to and from a Home Depot for the purpose of stealing pipes and end caps for use in the construction of pipe bombs.

e. Between March 1, 2008, and May 4, 2008, defendants RACHELLE LYNETTE CARLOCK and ELLA LOUISE SANDERS constructed pipe bombs at a residence in Menifee, California.

f. Between March 1, 2008, and May 4, 2008, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS and ERIC REGINALD ROBINSON tested several pipe bombs by exploding and attempting to explode the devices.

g. On or about April 25, 2008, defendants RACHELLE LYNETTE CARLOCK and ELLA LOUISE SANDERS constructed two pipe bombs, which included nails as part of their design, which were detonated and attempted to be detonated at the Federal Express Distribution Center, located at 1650 47th Street, San Diego, California.

h. On or about May 1, 2008, in El Cajon, California, defendant RACHELLE LYNETTE CARLOCK, purchased one pound of explosive materials, namely, Hodgdon's Triple Se7en Powder (a smokeless powder).

i. On or about May 3, 2008, in Menifee, California, defendant RACHELLE LYNETTE CARLOCK constructed three pipe bombs, which had nails as part of their design.

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j. On or about May 4, 2008, in Menifee, California, defendant RACHELLE LYNETTE CARLOCK placed three pipe bombs into a black backpack in order to transport the pipe bombs to San Diego, California.

k. On or about May 4, 2008, in Menifee, California, defendant ELLA LOUISE SANDERS helped dress defendant RACHELLE LYNETTE CARLOCK in dark clothing and helped tuck defendant RACHELLE LYNETTE CARLOCK's hair under her hat in order to conceal her identity.

l. On or about May 4, 2008, defendant ERIC REGINALD ROBINSON accompanied defendant RACHELLE LYNETTE CARLOCK, in a vehicle, from Menifee, California, to San Diego, California.

m. On or about May 4, 2008, defendant ERIC REGINALD ROBINSON waited in a vehicle, near the Edward J. Schwartz Federal Courthouse in San Diego, California, while defendant RACHELLE LYNETTE CARLOCK planted and detonated three pipe bombs at the Edward J. Schwartz Federal Courthouse.

n. On or about May 4, 2008, defendant RACHELLE LYNETTE CARLOCK planted and detonated three pipe bombs at the front doors of the Edward J. Schwartz Federal Courthouse in San Diego, California.

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o. On or about May 4, 2008, after defendant RACHELLE LYNETTE CARLOCK had planted and detonated the three pipe bombs, defendant ERIC REGINALD ROBINSON drove defendant RACHELLE LYNETTE CARLOCK from the area near the Edward J. Schwartz Federal Courthouse in San Diego, California, to a residence in Menifee, California.

All in violation of Title 18, United States Code, Section 2332a.

Count 2

3. On or about May 4, 2008, within the Southern District of California, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON, did knowingly and intentionally use a weapon of mass destruction, without lawful authority, to wit: pipe bombs, against property owned and used by the United States and one of its departments, to wit: the Edward J. Schwartz Federal Courthouse, located at 940 Front Street, San Diego, California; in violation of Title 18, United States Code, Sections 2332a(a)(3) and 2.

Count 3

4. Beginning on a date unknown to the grand jury, and continuing through May 4, 2008, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON, within the Southern District of California and elsewhere, did knowingly and intentionally conspire to:

a. maliciously damage and attempt to damage and destroy, by means of an explosive, to wit: pipe bombs, buildings and real property used in interstate commerce and in any activity affecting interstate commerce; and buildings and real property in whole or in part owned and possessed by, or leased to, the United States, and any department or agency thereof, in violation of Title 18, United States Code, Sections 844(f)(1) and (i);

b. possess firearms, to wit: pipe bombs, made in violation of the provisions of Chapter 53 of Title 26, United States Code, Section 5822; which is in violation of Title 26, United States Code, Section 5861(c); and

c. make firearms, to wit: pipe bombs, in violation of the provisions of Chapter 53 of Title 26, United States Code, Section 5822; which is in violation of Title 26, United States Code, Section 5861(f).

5. The grand jury adopts, realleges, and incorporates herein the overt acts in paragraph 2 of this Indictment as if set out fully herein.

All in violation of Title 18, United States Code, Section 371.

Count 4

6. On or about May 4, 2008, within the Southern District of California, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON, did maliciously damage and attempt to damage or destroy, by means of an explosive, to wit: pipe bombs, a building and real property owned and possessed by, the United States and one of its departments, to wit: the Edward J. Schwartz Federal Courthouse, located at 940 Front Street, San Diego, California; in violation of Title 18, United States Code, Sections 844(f)(1) and 2.

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Count 5

7. On or about May 4, 2008, within the Southern District of California, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON, during and in relation to a crime of violence, as set forth and charged in Counts 1 and 3 above, for which the defendants may be prosecuted in a court of the United States, did knowingly and intentionally use and carry a destructive device, to wit: a pipe bomb; in violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and 2.

Count 6

8. On or about May 4, 2008, within the Southern District of California and elsewhere, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON, during and in relation to a crime of violence, as set forth and charged in Counts 2 and 4 above, for which the defendants may be prosecuted in a court of the United States, did knowingly and intentionally use and carry a destructive device, to wit: a pipe bomb; in violation of Title 18, United States Code, Sections 924(c)(1)(A), (B)(ii) and 2.

Count 7

9. On or about May 4, 2008, within the Southern District of California and elsewhere, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON did knowingly and intentionally use an explosive, to wit: a pipe bomb, to commit a felony, as set forth and charged in Count 1 above, which may be prosecuted in a court of the United States; in violation of Title 18, United States Code, Sections 844(h)(1) and 2.

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Count 8

10. On or about May 4, 2008, within the Southern District of California and elsewhere, defendants RACHELLE LYNETTE CARLOCK, ELLA LOUISE SANDERS, and ERIC REGINALD ROBINSON did knowingly and intentionally use an explosive, to wit: a pipe bomb, to commit a felony, as set forth and charged in Count 2 above, which may be prosecuted in a court of the United States; in violation of Title 18, United States Code, Sections 844(h)(1) and 2.

Count 9

11. On or about March 26, 2008, within the Southern District of California, defendant ELLA LOUISE SANDERS, who had been convicted in the San Diego Superior Court on or about October 15, 2004, for violation of California Health and Safety Section 11350, a crime punishable by imprisonment for a term exceeding one year, knowingly received and possessed explosive materials, namely, Hodgdon's Triple Se7en Powder (a smokeless powder), which had been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 842(i) and 844(a).

Count 10

12. On or about April 7, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK knowingly furnished and exhibited a false, fictitious, and misrepresented identification, to wit, a California Driver's License in the name of "S.M.G.," to a licensed dealer in explosive materials, which identification was intended to deceive, and was likely to deceive, said dealer, for the purpose of obtaining explosive materials pursuant to Chapter 40 of Title 18 of the United States Code; in violation of Title 18, United States Code, Sections 842(a)(2) and 844(a).

Count 11

13. On or about April 7, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK, who had been convicted in the San Diego Superior Court on or about February 5, 1999, of California Penal Code Sections 664 and 211, a crime punishable by imprisonment for a term exceeding one year, knowingly received and possessed explosive materials, namely, Hodgdon's Triple Se7en Powder (a smokeless powder), which had been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 842(i) and 844 (a).

Count 12

14. On or about April 7, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK, did knowingly possess and use, in and affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, a California Driver's License in the name of "S.M.G.", with the intent to commit unlawful activities that constitute a violation of federal law, to wit, Use of False Identification to Obtain Explosive Materials, in violation of Title 18, United States Code, Section 842(a)(2), and Felon in possession of Explosive Materials, in violation of Title 18, United States Code, Section 842(i)(1); all in violation of Title 18, United States Code, Sections 1028(a)(7) and (b)(2)(B).

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Count 13

15. On or about May 1, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK knowingly furnished and exhibited a false, fictitious, and misrepresented identification, to wit, a California Driver's License in the name of "S.M.G.," to a licensed dealer in explosive materials, which identification was intended to deceive, and was likely to deceive, said dealer, for the purpose of obtaining explosive materials pursuant to Chapter 40 of Title 18 of the United States Code; in violation of Title 18, United States Code, Sections 842(a)(2) and 844(a).

Count 14

16. On or about May 1, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK, who had been convicted in the San Diego Superior Court on or about February 5, 1999, of California Penal Code Sections 664 and 211, a crime punishable by imprisonment for a term exceeding one year, knowingly received and possessed explosive materials, namely, Hodgdon's Triple Se7en Powder (a smokeless powder), which had been shipped and transported in interstate commerce; in violation of Title 18, United States Code, Sections 842(i) and 844(a).

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Count 15

17. On or about May 1, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK did knowingly possess and use, in and affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, a California Driver's License in the name of "S.M.G.," with the intent to commit unlawful activities that constitute a violation of federal law, to wit, Use of False Identification to Obtain Explosive Materials, in violation of Title 18, United States Code, Section 842(a)(2) and Felon in possession of Explosive Materials, in violation of Title 18, United States Code, Section 842(i)(1); all in violation of Title 18, United States Code, Sections 1028(a)(7) and (b)(2)(B).

Count 16

18. On or about May 13, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK knowingly furnished and exhibited a false, fictitious, and misrepresented identification, to wit, a California Driver's License in the name of "S.M.G.," to a licensed dealer in explosive materials, which identification was intended to deceive, and was likely to deceive, said dealer, for the purpose of obtaining explosive materials pursuant to Chapter 40 of Title 18 of the United States Code; in violation of Title 18, United States Code, Sections 842(a)(2) and 844(a).

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Count 17

19. On or about May 13, 2008, within the Southern District of California, defendant RACHELLE LYNETTE CARLOCK did knowingly possess and use, in and affecting interstate commerce, without lawful authority, a means of identification of another person, to wit, a California Driver's License in the name of "S.M.G.", with the intent to commit unlawful activities that constitute a violation of federal law, to wit: Use of False Identification to Obtain Explosive Materials, in violation of Title 18, United States Code, Section 842(a)(2), and Felon in possession of Explosive Materials, in violation of Title 18, United States Code, Section 842(i)(1); all in violation of Title 18, United States Code, Sections 1028(a)(7) and (b)(2)(B).

DATED: August 5, 2008.

A TRUE BILL:

Foreperson

KAREN P. HEWITT
United States Attorney

By:
WILLIAM P. COLE
Assistant U.S. Attorney